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UBER TECHNOLOGIES, INC.
17 and OTTOMOTTO LLC

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION

21 WAYMO LLC,
22 Plaintiff,
23 v.
24 UBER TECHNOLOGIES, INC.,
25 OTTOMOTTO LLC; OTTO TRUCKING LLC,
26 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF PLAINTIFF
WAYMO LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF ITS REPLY IN
SUPPORT OF MOTION FOR
CONTINUANCE OF TRIAL DATE
(DKT. 1690 (CORRECTED AT DKT.
1694))**

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness, I
4 could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Plaintiff Waymo LLC's Administrative Motion to File Under Seal Portions of Its
6 Reply in Support of Motion for Continuance of Trial Date (Dkt. 1690 (corrected at Dkt. 1694)).

7 2. I have reviewed the following documents and confirmed that only the portions
8 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Reply in Support of Motion for Continuance of Trial Date ("Reply")	Red Boxes

12 3. The red boxes on page 12 of the Reply contain highly confidential information
13 regarding financial forecasts based on hypothetical assumptions, which are not publicly known.
14 These financial forecasts based on hypothetical assumptions are maintained as confidential, and
15 their disclosure could allow competitors to acquire knowledge into Uber's internal assumptions
16 and strategy. Uber's competitive standing could be significantly harmed.

17 4. The red boxes on page 12 of the Reply also contain highly confidential
18 information about the development of technical features to Uber's LiDAR, which are not publicly
19 known. This development information is maintained as confidential, and their disclosure could
20 allow competitors to acquire insight to Uber's LiDAR development timeline, such that Uber's
21 competitive standing could be significantly harmed.

22 5. Defendants' request to seal is narrowly tailored to the portions of Waymo's Reply
23 and its supporting papers that merit sealing.

24 I declare under penalty of perjury that the foregoing is true and correct. Executed this
25 25th day of September, 2017 in San Francisco, California.

27 /s/ Michelle Yang

28 Michelle Yang

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. Gonzalez, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

Dated: September 25, 2017

/s/ Arturo J. Gonzalez

ARTURO J. GONZALEZ